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March 20, 2008

BY FAX

Hon. Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

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Re: United States v. Antoine White and Marilenny Santos
07 Cr. 570 (NRB)

Dear Judge Buchwald:

This is to request a further extension of the time to file written motions on behalf of the above-captioned defendants. Counsel for co-defendant White joins in this request and the Government has consented to this request.

Your Honor previously granted a joint defense request to extend the time for filing motions to March 24, 2008, in part to allow for co-defendant meetings. However, our initial efforts to do so met with little success; each time, Mr. White (who is housed in Brooklyn) was not produced to the MCC. A few days ago we were at last able to have our first meeting; but that too was cut short by institutional delays. Additional time is needed for co-defendant meetings. Also, the parties believe that continuing plea discussions would be worthwhile.

For these reasons, we respectfully request a new date of April 21, 2008, by which motions, if any, are to be filed. Defense counsel consent to the further exclusion of time.

Respectfully submitted,

Bruce McIntyre

BRUCE MCINTYRE
Attorney for Marilenny Santos

cc: AUSA Antonia M. Apps
Harry H. Rimm, Esq.

Sgt. [unclear]
Reice
3/24/08